Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules to	)	CC Docket No. 94-102
Ensure Compatibility With Enhanced 911	)	
Emergency Calling Systems	)	

WORLDCOM COMMENTS

WorldCom, Inc. ("WorldCom") respectfully submits these comments in response to the Further Notice of Proposed Rulemaking in the above-referenced proceeding (rel. December 20, 2002). WorldCom limits its comments to the questions asked regarding new technological platforms, specifically those that use Internet Protocol.

As Dale Hatfield has observed, "the use of IP protocols could provide emergency service systems with '[] expanded services, more resilient networks, and faster response times.'"[1] By seamlessly integrating voice into the IP data stream, IP-based services could support richly enhanced emergency service functionality as compared to the analog-based capabilities of existing emergency services. But this vision cannot be achieved without substantial upgrades to the existing emergency services infrastructure, which was not built with IP-based service providers in mind. In the interim, the Commission should proceed cautiously in extending E911 obligations to IP-based service providers.

[1] A Report on Technical and Operational Issues Impacting the Provision of Wireless Enhanced 911 Services ("Hatfield Report"), Section 4.4 (quoting IEEE Internet Computing, "Providing Emergency Services in Internet Telephony," Henning Schulzrinne and Knarig Arabshian, May/June 2002).

Dr. Hatfield has also observed that, "the existing wireline E911 infrastructure [] is seriously antiquated."[2] Indeed, many 911 tandems do not support SS7, let alone IP-based protocols such as Session Initiation Protocol (SIP). The incompatibility of the existing E911 infrastructure with IP-based services makes it quite difficult to deploy E911-capable IP-based services. Moreover, until the existing infrastructure is modernized, there can be no hope of achieving the potentially feature-rich emergency services that IP could make possible.

Accordingly, the Commission can best pursue its twin goals of encouraging the development of new technologies and enhancing public safety, by focusing its leadership on replacing the existing antiquated E911 infrastructure with a modern, IP-compatible infrastructure that will facilitate the deployment of E911-capable, feature-rich, IP-based services.

Until such an infrastructure exists, the Commission should not place any broad E911 mandates on IP-based service providers. IP-based services face significant challenges in providing E911 functionality given today's antiquated infrastructure. IP services may be fully mobile and accessible from any point on the public Internet. They may also be available over non-traditional CPE such as laptop computers, PDAs, or devices configured to provide voice over WiFi networks. Mobility and CPE flexibility constitute significant barriers to the implementation today of E911-capable, IP-based services.

Insofar as IP-based service providers seek to offer services that compete directly with traditional, wireline local exchange service, they have every incentive to offer the most robust E911 capabilities that the existing infrastructure allows. Consumers will be

[2] Hatfield Report at 14.

hesitant to replace their wireline phones with IP-based services unless those services include the ability to reach emergency service operators. As long as consumers receive accurate information about emergency services capabilities, the Commission should place no unachievable mandates on providers of IP-based services that include voice functionality.

Respectfully submitted,

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/s/

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